

Remedium

Robert J. Medler
Director
Remedium Group, Inc.

June 15, 2009

U.S. Environmental Protection Agency
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Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – May 2009

Dear Bonnie:

This progress report describes work completed during the month of May 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during the month of May.

A. ACTIONS TAKEN

- Programmed ISCO automatic samplers/flow sensors at LRC-06, LRC-02 and CC-02 to begin flow-based surface water sampling on May 11, 2009. Samples will be collected in accordance with specifications in *Remedial Investigation for Operable Unit 3, Libby Asbestos Superfund Site, Phase III Sampling and Analysis Plan* (Phase III SAP).
- Conducted a field investigation on May 20 and May 21 to characterize the nature of step-like topography on the "over-steepened" coarse tailings slope above and northeast of the Tailings Dam left abutment. Investigation included field measurement of slope angles, excavation of trenches into the tailings, and detailed photography of surface features. Findings of the investigation will be summarized in a technical memorandum, to be issued in June, 2009.

B. SAMPLING RESULTS

None.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Perform an evaluation of air-sampling pumps under actual field conditions at

OU3. The evaluation will be performed as soon as snowmelt and soil drying are sufficient to allow access to forest and logging roads under dusty conditions.

- Perform field reconnaissance to evaluate the feasibility of performing the Activity-Based Sampling (ABS) script at eleven ABS sites proposed by EPA. If conditions at any of the proposed locations will prevent the ABS script from being safely and fully performed, locate suitable nearby alternate locations for EPA consideration.
- Conduct a field tour of the OU3 study area with EPA and its contractors, as discussed during meetings on February 5 at EPA Region 8 headquarters in Denver. The tour will focus on areas outside the mine site, in portions of OU3 proposed for ABS as part of Phase III investigations. The tour will be conducted after field reconnaissance of proposed ABS locations, in mid- June, 2009.
- Continue flow-based sampling of surface water at LRC-06, LRC-02 and CC -02, in accordance with details provided in the Phase III SAP.
- Perform the third and final round of groundwater sampling from five on-site wells, in accordance with details contained in the *Remedial Investigation for Operable Unit 3, Libby Asbestos Superfund Site, Phase II Sampling and Analysis Plan* (Phase II SAP).
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL
ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of May.

A. ACTIONS TAKEN

- Reviewed draft amphibian DQO provided by EPA;
- Reviewed draft small mammal DQO provided by EPA;
- Reviewed draft small mammal SOP provided by EPA;
- Reviewed draft stock solution protocol provided by EPA;
- Initiated review of draft Phase III SAP developed by EPA;
- Prepared cost estimates for initial small mammal activities (necropsy workshop; June 2009 reconnaissance trip).

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Complete review and submit questions/clarifications to EPA on Phase III Final SAP/SOPs;
- Develop SOPs requested by EPA;
- Conduct necropsy workshop with wildlife toxicologists and histologist;
- Conduct small mammal reconnaissance trip to Libby;
- Prepare small mammal reconnaissance trip Technical Memorandum;
- Submit costs to Remedium for rainbow trout pilot and definitive toxicity tests;
- Contact Fort Labs to request cost estimate for chronic sediment/water amphibian toxicity bioassay.

**C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED**

None.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner
John Garr
Catherine LeCours – Montana DEQ
Robert Marriam
Sue Robinson – Parametrix
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